

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
<b>v.</b>	:	<b>Criminal Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN, et al.</b>	:	

**DEFENDANT’S PROPOSED JURY INSTRUCTIONS**

Pursuant to Local Criminal Rule 30, defendant Bijan Rafiekian, by and through counsel, respectfully submits his initial proposed jury instructions to the Court, attached hereto as Exhibit 1 (with citations) and Exhibit 2 (without citations). The defendant reserves his right to supplement this submission with other instructions, including but not limited to theory of the defense instructions, which will be affected by the presentation of the evidence, the Court’s rulings during trial, and the outcome of various motions in limine.

RESPECTFULLY SUBMITTED

/s/

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Mark J. MacDougall (*Pro Hac Vice*)  
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/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, on the 8th day of July 2019, true and genuine copies of Defendant Bijan Rafiekian's Proposed Jury Instructions were sent via electronic mail by the Court's CM/ECF system to the following:

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/s/ \_\_\_\_\_  
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